

SUNETHRA MURALIDHARA, ESQUIRE
 Nevada Bar No. 13549
 Wright Marsh & Levy
 300 S. Fourth Street
 Suite 701
 Las Vegas, NV 89101
 Phone: (702) 382-4004
 Fax: (702) 382-4800
 smuralidhara@wmlawlv.com
 Attorney for Dannie Alton Lockett

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	CASE NO. 2:22-CR-00026-JCM-VCF
Plaintiff,)	
)	STIPULATION TO CONTINUE
v.)	SENTENCING HEARING
)	
DANNIE ALTON LUCKETT,)	(SECOND REQUEST)
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by and through its attorney, Jason M. Frierson, United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney; and Defendant Dannie Alton Lockett, by and through his counsel, Sunethra Muralidhara, Esquire, of Wright Marsh & Levy, that the sentencing hearing currently scheduled for August 16, 2023 at 10:30 a.m. be vacated and set to a date and time convenient to this Court, but no sooner December 1, 2023.

This stipulation is entered into for the following reasons:

1. Defense counsel has a 7 to 10 day trial scheduled in *United States v. Eghomware Jerry Igbinovia*, Case no. 2:19-cr-00154-RFB-VCF starting August 7, 2023. Given the *Igbinovia* trial expectancy, this poses a likely conflict with the currently scheduled sentencing hearing. Additionally, defense counsel is preparing to go forward with an extensive 4 to 6-week long tax trial in *United States v. Bradford*, Case no. 2:19-cr-00222-GMN-BNW set to begin September 11, 2023.

///

2. Given counsel's trial schedule and other case related matters, she requires additional time to prepare mitigation for the sentencing hearing. Additionally, defense counsel has retained a CJA forensic psychiatrist to conduct an examination, evaluation, and analysis of medical records/pertinent discovery all in support of additional mitigation in support of the defense's ultimate sentencing recommendation. The defense team requires more time to complete this analysis, thoroughly discuss the Expert's findings, and determine whether a full forensic report must be prepared for sentencing.

3. The parties agree to the continuance. Mr. Luckett is in pretrial detention and agrees to this requested continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this Stipulation is made in good faith and not for purposes of delay.

6. This is the second request for a continuance of the sentencing hearing.

Dated this 15th day of June, 2023.

WRIGHT MARSH & LEVY

JASON M. FRIERSON
UNITED STATES ATTORNEY

By: /s/ Sunethra Muralidhara
SUNETHRA MURALIDHARA, ESQUIRE
Attorney for Dannie Alton Luckett

By: /s/ Daniel J. Cowhig
DANIEL J. COWHIG
Assistant United States Attorney


UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1	UNITED STATES OF AMERICA,)	
2)	
3	Plaintiff,)	CASE NO. 2:22-CR-00026-JCM-VCF
4)	
5	v.)	ORDER
6)	
7	DANNIE ALTON LUCKETT,)	
8	Defendant.)	

Based on the Stipulation of the parties and for good cause appearing, the sentencing hearing in this matter is hereby continued. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

IS IT HEREBY ORDERED that the sentencing in the above-captioned matter currently scheduled for August 16, 2023, at 10:30 a.m., be vacated and continued to **December 6, 2023, at 10:00 a.m.**

Dated: June 21, 2023.



JAMES C. MAHAN
UNITED STATES DISTRICT COURT